

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

YVONNE ANSAH OWUSU,

Defendant.

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No. 1:11mj 405

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

Patricia Craig, being duly sworn, says:

1. I am a Special Agent with U.S. Homeland Security Investigations (HSI) Directorate of Immigration and Customs Enforcement (ICE) and have been so employed since August 2009. I am currently assigned to the Special Agent in Charge, Washington, D.C., Field Office. As part of my training for this position, I successfully completed the Federal Law Enforcement Training Center's Criminal Investigator Training Program and the ICE Special Agent Training Program. Prior to my employment as a Special Agent with ICE, I was a United States Capitol Police Officer for three years. As part of my training with the U.S. Capitol Police, I completed 12 weeks of the Federal Law Enforcement Training Center's Uniform Police Training Program and 12 weeks of the U.S. Capitol Police Training Program.

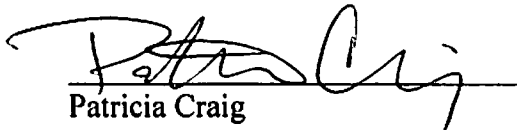
2. This affidavit is submitted in support of a criminal complaint for YVONNE ANSAH OWUSU for knowingly and intentionally importing into the United States from a place outside thereof one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1) & (b)(1)(A).

3. On May 29, 2011, YVONNE ANSAH OWUSU arrived at Dulles International Airport (IAD) in Loudoun County, Virginia, in the Eastern District of Virginia, on United Airlines flight number 991 from Accra, Ghana. Upon arrival at IAD airport, OWUSU and her luggage were inspected by U.S. Customs and Border Protection Officers. During the secondary examination, U.S. Customs and Border Protection Officers discovered a bulge within the lining of OWUSU's luggage. Upon further examination, CBP officers found concealed within OWUSU's luggage two packages containing a brown powdery substance that field tested positive for heroin. The total weight of the packages containing heroin was approximately 3,309.2 grams.

4. HSI Special Agents arrested OWUSU, determined that she could speak and understand the English language, and advised her of her *Miranda* rights. After initially invoking her right to counsel, OWUSU later asked to speak with the agents. She was again advised of her rights. OWUSU then signed a written waiver of her *Miranda* rights and was interviewed.

5. OWUSU stated that a subject named "Abdellah" delivered the suitcase to her at a hotel in Accra Ghana. Abdellah told OWUSU that the suitcase contained one kilogram of heroin and that OWUSU would get paid \$15,000 to transport the suitcase containing heroin to the United States. OWUSU said that Abdellah purchased her airline ticket for her travel to the United States. OWUSU stated that she was picked up the night before by an unknown associate of Abdellah's who provided her with some cash and drove her to the airport. OWUSU was instructed by Abdellah to contact Abdellah by telephone when OWUSU arrived in the United States. Abdellah would then give her further instructions on how to deliver the heroin.

6. Based upon the forgoing, I submit that there is probable cause to believe that OWUSU did knowingly and intentionally import into the United States from a place outside thereof one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1) & (b)(1)(A).



Patricia Craig
Special Agent
U.S. Department of Homeland Security
Immigration & Customs Enforcement

Sworn to and subscribed before me this 29th day of May, 2011.

/s/
Ivan D. Davis
United States Magistrate Judge